UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 0 5 2013

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/Development Section
Ohio Environmental Protection Agency, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

RE: Comments for Draft Title V Permit for Toledo Edison Co., Bay Shore Plant

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit, permit number P0105130, for Toledo Edison, Co. Bay Shore Plant, located in Oregon, Ohio. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. On page 27 of 141, the draft permit includes Carbon Monoxide (CO) emission limitations for Emission Unit (EU) B006. The draft permit states in subsection "2.b)(1)a." that the CO emissions shall not exceed 278.6 lbs/hr as a rolling, 3-hour average, except during periods of startup and shutdown. The previous Title V permit, issued 11/19/04, stated that the CO emissions shall not exceed 278.6 lbs/hr at any load. Please provide background to justify the change in requirement. If this requirement originated as a best available control technology limitation, the facility must be in compliance with it at all times, including during startup and shutdown.

2. On page 28 of 141, the draft permit includes Organic Compounds (OC) emission limitations for EU B006. The draft permit does not include regular testing of OC. The compliance method listed is a one-time calculation using the hourly OC emission limitation and the maximum annual operating hours. This calculation does not demonstrate compliance with the limitation, as there are no variables related to actual production at the facility. Ohio Environmental Protection Agency should use test data and actual production rates to show that the facility is in compliance with the OC emission limitations.

3. On page 87 of 141, the draft permit lists the testing requirements for EU F008. The fugitive Particulate Emission (PE) calculation for operation of vehicles on top of storage piles assumes 2080 hours/year as maximum operational hours. However, no restrictions appear in the operational restrictions section for EU F008 on page 84. Throughout the

draft permit, 8760 is used as the maximum operational hours. Please verify if the calculation incorrectly assumes 2080 operating hours or if an operational restriction should be included for F008.

4. On page 94 of 141, the draft permit lists the testing requirements for EU F010. EU F010 is controlled by a baghouse. The applicable compliance method describes the development of the emission limitation. This calculation only describes how the limitation was created. The calculation does not include any variables related to actual production at the facility. The calculations should use actual test data. Also, the calculation assumes 99.9 percent control efficiency from the main and auxiliary dust collectors. There are no monitoring or recordkeeping requirements to ensure proper operation of the dust collectors. A Bag Leak Detection System (BLDS) and recordkeeping requirements should be included in the permit for the dust collectors to ensure continuous compliance with PE limitations.

5. EU F011 uses a baghouse to control PE. The permit does not include monitoring or recordkeeping requirements for the baghouse. Determining compliance with PE limits associated with coke, limestone and fly ash conveying make the assumption that the baghouse efficiency is 99 percent. There is no testing requirement to verify the control efficiency of the baghouse nor is there any periodic monitoring of the baghouse to ensure that it is operating properly. A BLDS and recordkeeping requirements should be included in the permit for the dust collectors to ensure continuous compliance with PE limitations.

6. On page 106 of 141, the permit lists testing requirements for EU F011. The subsection "g." has the requirements for fly ash conveying. This section does not include the language that may require the facility to conduct compliance testing as it appears in subsections "f." and "h." The compliance testing language should be added to this section.

7. EU F012 uses a fabric filter to comply with limitations for PE and Particulate Matter less than 10 microns (PM10). The calculation listed as the applicable compliance method assumes a 90 percent control efficiency for the fabric filter, however, there are no monitoring or recordkeeping requirements for the fabric filter to ensure proper operation or verification that the assumed control efficiency is being met. Testing of the fabric filter, a BLDS, and recordkeeping requirements should be included in the permit for the fabric filter to ensure continuous compliance with PE and PM10 limitations.

8. On page 110 of 141, the permit assumes that there is 100 percent capture efficiency for stack emissions from EU F012. The permit does not have any requirements to verify the capture efficiency of the fabric filter. This assumption should be verified regularly since the process is only partially enclosed.

9. In several places throughout the permit, the applicable compliance method uses calculations to determine compliance. While calculating emissions from a process can be an acceptable means to determine compliance with applicable limitations, the

calculations in the permit all use maximum production values and AP-42 emission factors. The permit should use actual production data from the facility as well as any emission factors that were obtained by required testing.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,

Danny Marcus for

Genevieve Damico
Chief
Air Permits Section